

From: Kory Johnson [kjohnson@mnvalleyrec.com]
Sent: Tue 3/9/2004 12:40 PM
To: ruscomme@RUS.usda.gov
Subject: Specifications and Drawings for 12.47/7.2 kV L

I am sending this email concerning the "Publication of Proposed Rule 7 CFR 1728" I have a number of concerns against this proposed rule.

1. The first objection I have is that personal will need to learn a complete set of new construction units. ie an A1 and C1, which are our predominate construction units would no longer be an A1 and C1. What will be the number of man hours associated with retraining our line personnel, staking people, work order clerks and the accounting personnel to become familiar with the new numbers and the cost of this training?

2. The expense of developing a new set of computerized assembly and material units would be a very significant expense for the RUS borrowers. Assuming 2 man hours per unit to complete this process, it will be in excess of 600 man hours.

3. The problem of dealing with existing units for retirement must be addressed. Will we maintain a second set of construction standards and the associated computerized records for the retirement of existing facilities or do we try to guess the closest new construction unit? If in fact we maintain the old units for retirement as the RUS GFR's have indicated at different meeting, this also in an additional expense.

4. This cooperative has been using an in house computerized Excel staking sheets for the past 7 to 8 years. These sheets were built using the existing construction assembly units. What will be the conversion cost for these or the man hours to redo these sheets?

We are a small cooperative and I see this a being a major expense for our system. This system was built using these specs and the current numbering of the specs and these have served us very well. I understand the need for expanding the specs and adding new ones but I feel that the conversion to this new numbering system will waste of time and money for us.

I would be very happy to discuss this further will you if you would like. I can be reached at 320-269-2163.

Sincerely

Korwin Johnson
Manager of Engineering and Operations
MN Valley Cooperative Light and Power
Montevideo, MN 56265